



EPA Proposes Cleanup Plan for Allied Paper Landfill Site

Allied Paper/Portage Creek/Kalamazoo River Site

Kalamazoo, Michigan

September 2015

You are invited

EPA invites you to discuss the proposed cleanup plan for the Allied Paper Landfill site.

EPA will hold a public meeting, Thursday, Nov. 12, at 6 p.m., at the Washington Writers' Academy cafeteria, 1919 Portage St.

EPA representatives will present details of the plan, and oral comments will be accepted and recorded by a court reporter.

Read the proposed plan

The detailed plan is available for review in the information repositories and on the Web (see box, Page 4).

Public comment period

You may comment on the proposed plan from Sept. 30 through Dec. 1.

There are several ways to offer comments:

- Fill out and mail the enclosed comment form, or submit it at the public meeting.
- Orally or in writing at the public meeting.
- Go to:

www.epa.gov/region5/cleanup/alliedpaper/pubcomment.html.

- Send a fax to 989-401-5508.

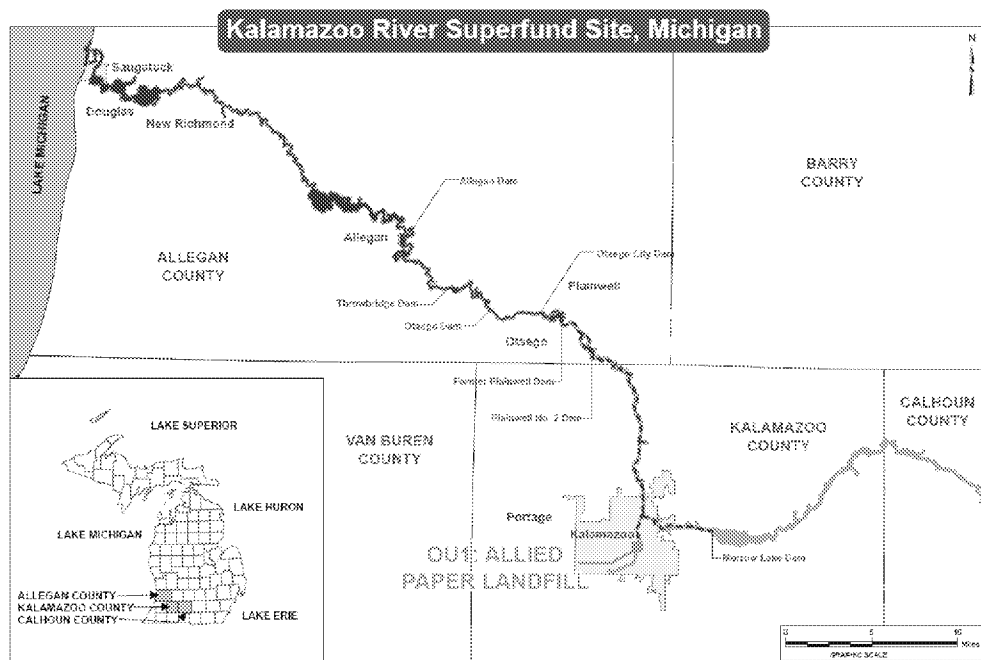
EPA may modify the plan or select another solution based on new information or public comments, so your opinion is important.

The U.S. Environmental Protection Agency, with the Michigan Department of Environmental Quality, plans to clean up contaminated material at a former landfill in part of the Allied Paper/Portage Creek/Kalamazoo River Superfund Site called Allied Landfill, or Operable Unit 1. The cleanup will consist of consolidating and capping material containing PCBs and other contaminants, and installing a groundwater monitoring network. Areas of the site would be available for future reuse and redevelopment.

Your comments are needed

EPA will accept comments on the proposed cleanup plan from Sept. 30 through Dec. 1 (see box, left). This fact sheet provides background information, describes cleanup options and explains EPA's recommendations¹. You can find more details in a document called *Allied Paper/Portage Creek/Kalamazoo River Superfund Site Proposed Plan for Operable Unit 1 – Allied Paper Landfill*, at www.epa.gov/region5/cleanup/alliedpaper and at the local information repositories listed on Page 4.

EPA will review all comments before making a final decision, and will respond to comments in a document called a "responsiveness summary." This will be part of the final cleanup plan called the "record of decision."



¹ Section 117(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA known as the Superfund law) requires publication of a notice and a proposed plan. It also requires a public comment period and the opportunity for a public meeting. This fact sheet summarizes the technical written proposed plan and other site-related environmental reports that can be viewed at the information repositories listed on Page 4.

Background

Several paper mills along the Kalamazoo River and Portage Creek recycled various types of paper stock starting in the 1950s. This included carbonless copy paper containing PCBs that were released into the mills' waste streams and eventually into Portage Creek and the Kalamazoo River.

In 1990, the site was added to the National Priorities List because of PCBs in the sediment, fish and surface water of the Kalamazoo River. The site consists of 77 miles of the Kalamazoo River and a 3-mile stretch of Portage Creek, and is in both Allegan and Kalamazoo counties in southwest Michigan (*see map, Page 1*).

This plan is for Allied Landfill, between Cork Street and Alcott Street in Kalamazoo (*see map, below*). The site includes areas that are zoned for residential, commercial and manufacturing uses, and Portage Creek runs through the property.

Why is a cleanup needed?

There have been several cleanups at Allied Landfill since the early 1990s to minimize exposure to PCBs and to stop the release of contamination to Portage Creek and the Kalamazoo River. Those actions, including removal of 146,000 cubic yards of PCB-contaminated material from the Bryant Mill Pond (the Portage Creek floodplain within the site boundaries) and capping that material on-site, have decreased PCB levels significantly in Portage Creek itself and in fish. .

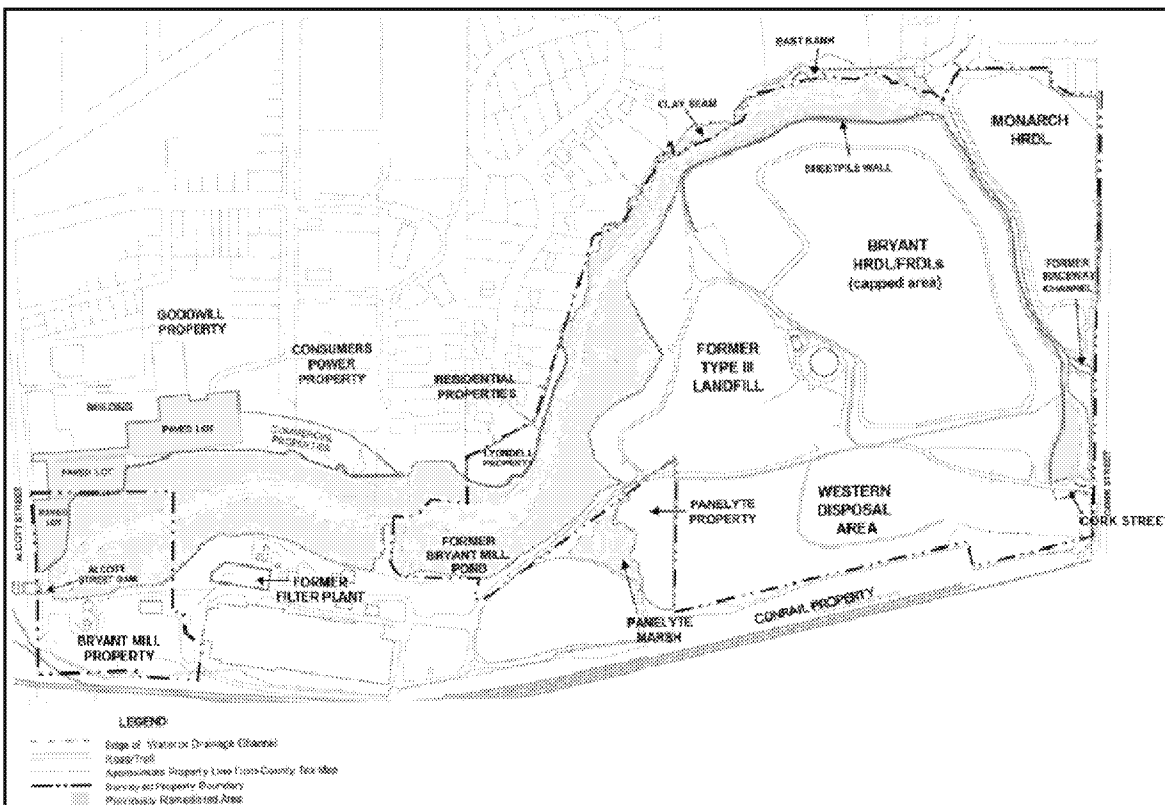


Aerial photo of Allied Landfill and Portage Creek

However, 1.6 million cubic yards of PCB contamination in the former disposal areas pose an unacceptable risk to people and the environment. The plan focuses on cleaning up these areas.

Cleanup alternatives

Based on site contaminants, characteristics, overall objectives and technology, EPA identified seven cleanup alternatives for the site (*see table, Page 5*). Each alternative was evaluated against criteria established by federal law (*see box, Page 3*). However, the last two criteria, state and community acceptance, will not be evaluated until after the comment period and public meeting. Each cleanup alternative, except the no-action alternative, reduces exposure to PCBs.



This map shows details of the Allied Landfill site.

Explanation of evaluation criteria

1. Overall protection of human health and the environment. Examines whether an option protects both human health and the environment. This standard can be met by reducing or removing pollution or by reducing exposure to it.

2. Compliance with applicable or relevant and appropriate requirements. Ensures options comply with federal and state laws.

3. Long-term effectiveness and permanence. Evaluates how well an option will work over the long term, including how safely remaining contamination can be managed.

4. Reduction of toxicity, mobility or volume through treatment. Determines how well the option reduces the toxicity, movement and amount of pollution using treatment.

5. Short-term effectiveness. Compares how quickly an option can help the situation and how much risk exists while the option is under construction.

6. Implementability. Evaluates how feasible the option is and whether materials and services are available in the area.

7. Cost. Includes not only buildings, equipment, materials and labor, but also the cost of maintaining the option for the life of the cleanup.

8. State acceptance. Determines whether the state environmental agency (in this case the MDEQ) accepts the option. EPA evaluates this criterion after receiving public comments.

9. Community acceptance. Considers the opinions of the public about the proposed cleanup plan. EPA evaluates this criterion after a public hearing and comment period.

EPA's recommended alternative

Based on the criteria, EPA recommends Alternative 2D, consolidating materials to a 27-acre area, and installing a cap and a long-term groundwater monitoring network. Areas outside the cap would be available for commercial/industrial redevelopment, and the capped area would be available for some recreational reuse. Alternative 2D meets the evaluation criteria, offers a high degree of long-term effectiveness and permanence, and represents the best balance of long-term and short-term effectiveness, implementability and cost.

Alternative 2D would meet the EPA's cleanup goals for the site because it would:

- Significantly reduce the exposure of people and animals to contamination.
- Comply with federal and state regulations.
- Provide a cost-effective way to manage PCB contamination.
- Complete activities within a reasonable three years.

Next steps

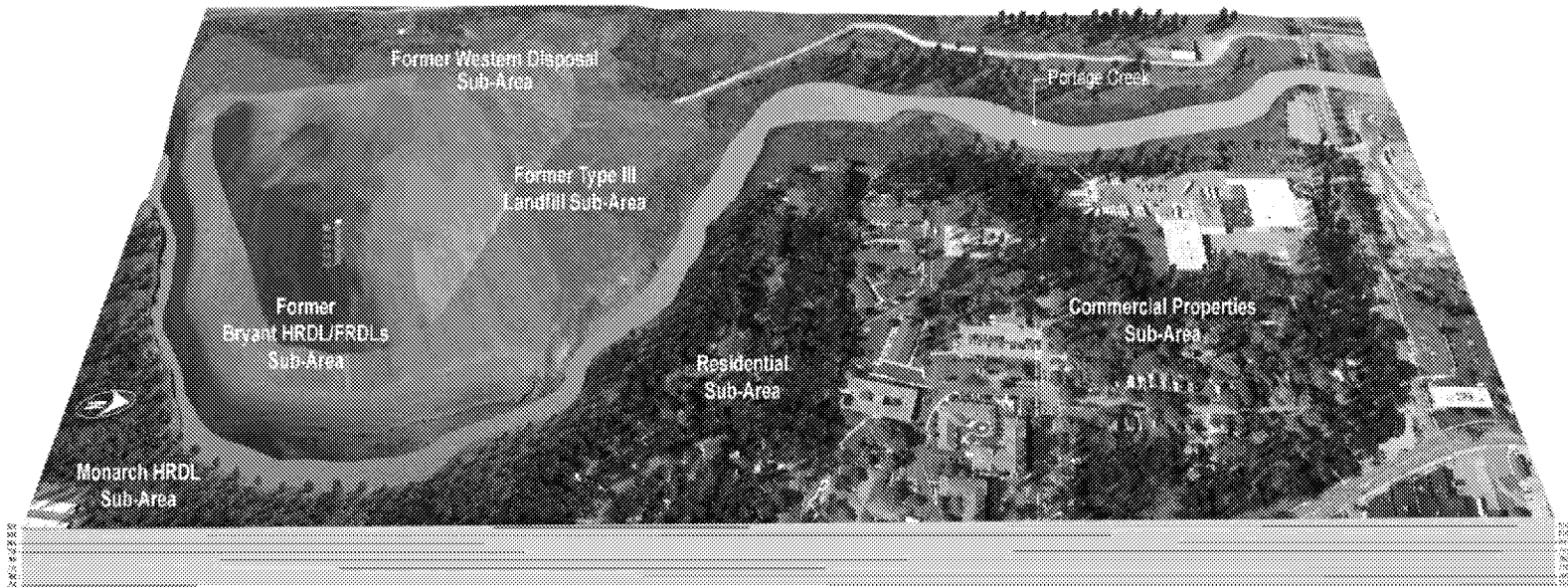
Before making a final decision, EPA and MDEQ will review all comments from the public. EPA will respond to the comments and make those responses available in the final decision document. EPA could change the recommended cleanup plan based on public comments.

EPA will announce its final cleanup plan in a local newspaper advertisement. Copies of the final plan will be available at the information repositories (*see Page 4*) and at www.epa.gov/region5/cleanup/alliedpaper.

For more information, contact:

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3-D Representation of Alternative 2D

For more information

You can read documents related to the Allied Paper Landfill site at www.epa.gov/region5/cleanup/alliedpaper, or at these information repositories:

U.S. EPA Record Center
77 W. Jackson Blvd., 7th Floor
Chicago

Charles Ransom Library
180 South Sherwood
Plainwell

Kalamazoo Public Library
315 South Rose
Kalamazoo

Allegan Public Library
331 Hubbard St.
Allegan

Otsego District Library
219 South Farmer St.
Otsego

Saugatuck-Douglas Library
10 Mixer St.
Douglas

Waldo Library
Western Michigan University
1903 W. Michigan Ave.
Kalamazoo

City _____ State _____ ZIP _____

Allied Paper Landfill Comment Sheet

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Here

Diane Russell
Community Involvement Coordinator
U.S. EPA, Region 5
Saginaw Community Information Office
804 S. Hamilton St., Suite 111
Saginaw, MI 48602

Cleanup Alternatives Comparison Table

Cleanup Alternatives	Description	Protective	Time to Implement Cleanup	Short-term impacts	Cost
1 - No Action	Required baseline to compare with other alternatives. Site would be revisited every 5 years accounting for minimal cost.	No	N/A	No worker risk, but offsite migration remains.	\$110,000
2 - Consolidation and Capping	All Group 2 Alternatives have the following common elements: *Excavate contaminated materials along lagoons, disposal areas. *Consolidate contaminated material and backfill with clean material. *Install a cap over consolidated areas. *Install a long-term groundwater monitoring system. *Install site restrictions to limit commercial and residential use. *Restore wetlands. *Monitor underlying groundwater.				
Alternative 2A: consolidate and cap two areas (Monarch and Operational areas)	Install two separate caps over Monarch area and Operational areas.	Yes	2 years	Least impacts from construction, truck traffic, noise, dust.	\$44 million
Alternative 2B: consolidate and cap one area (Operational area)	Remove material in Monarch area and consolidate under one cap in Operational area.	Yes	2 years	Some impacts due to moving of Monarch material.	\$43 million
Alternative 2C: excavation and consolidation of contaminated areas and offsite incineration of excavated material	For excavated material: consolidate contaminated material with PCB contamination levels below 500 mg/kg, and transport PCB-contaminated material with contamination levels above 500 mg/kg to an offsite location for incineration. Remove material at Monarch and consolidate under one cap in Operational area.	Yes	2 years	Some impacts due to potential exposure during construction and transport offsite.	\$70 million
Alternative 2D: consolidation of contaminated areas into reduced area (EPA's recommended option)	Consolidate contaminated material into a smaller sized area set back from Portage Creek to create an area available for redevelopment and community use in the future. Remove material at Monarch and consolidate under one cap in Operational area.	Yes	3 years	Some impacts due to increased excavation, backfill volumes and slightly longer timeframe.	\$63 million
3 - Removal and off-site disposal of contaminated material	Excavate contaminated areas and transport the material offsite for disposal. Backfill with clean material and install site restrictions to limit commercial use.	Yes	5 years	Higher impacts due to volume of material; high risk of excavated material impacting Portage Creek and greatest amount of truck travel for disposal and bringing backfill material on-site.	\$238 million
4- Encapsulation containment system	*Excavate contaminated areas and consolidate the excavated material. *Line the landfill bottom with compacted clay and a flexible synthetic material. *Place contaminated material in the lined area. *Install cap over material. *Install site restrictions to limit commercial use. *Restore wetlands and monitor groundwater.	Yes	10 years	Highest impacts due to volume of material potentially impacting Portage Creek and duration, not as many transportation impacts as Alternative 3 since material is managed at site.	\$159 million

EPA Proposes Cleanup Plan, Seeks Public Comments

Public Meeting
Thursday, Nov. 12
6 p.m.

Washington Writers' Academy
Cafeteria
1919 Portage St.

If you will need special accommodations at the meeting, contact:
Diane Russell, Community Involvement Coordinator, 989-401-5507, russell.diane@epa.gov

ALLIED PAPER LANDFILL SITE:
EPA Proposes Cleanup Plan